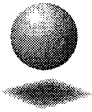


5/27/05-02404



**CH2MHILL**

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May 27, 2005

05-GBD-0317

Mr. Adolph Everett, P.E.  
Chief, RCRA Programs Branch  
Division of Environmental Planning and Protection  
U.S. Environmental Protection Agency  
Region 2  
290 Broadway, 22<sup>nd</sup> Floor  
New York, NY 10007-1866

Re: Navy's Responses to Comments - USEPA letter dated March 11, 2005 re Atlantic Fleet Weapons Training Facility (AFWTF) - EPA I.D.# PRD980536221 Comments on *Draft Site Specific Work Plan for Phase I RCRA Facility Investigation for Eight PI/PAOC Sites, Former Atlantic Fleet Weapons Training Facility, Vieques Island, Puerto Rico* (CH2M HILL, November 2004)

Dear Mr. Everett:

On behalf of the Navy, CH2M HILL is pleased to submit the Navy's Responses to Comments to the referenced subject document. Additional copies of the responses have been sent to the individuals listed below. Numbers and types of copies are shown in parentheses following the individuals' names.

It is noted that in the latest round of comments submitted by EPA, comments from multiple reviewers were submitted individually, rather than compiled into single comments on each response. Further, there was disagreement among the various EPA reviewers regarding certain responses, resulting in conflicting comments from EPA. In addition, it is noted that for some responses, the same or similar comments were made by multiple reviewers. The Navy respectfully requests that in future comment submittals by EPA, conflicting comments are resolved and similar comments are consolidated prior to submitting the comments to the Navy.

Because there is some discrepancy among the various reviewers and between the Navy and the regulatory agencies regarding the need for and extent of investigations at several PI/PAOC sites, it has been agreed by EPA that it will be most efficient and expedient to hold a meeting among the regulatory agency and Navy representatives to discuss the discrepancies and come to concurrence on which PI/PAOCs will undergo investigations and the scope of those investigations before revising the Draft Final Phase I Work Plan and submitting it as Draft Final. There is a Technical Subcommittee Meeting scheduled at EPA Region 2 on June 14 and 15, 2005, during which it may be possible to discuss the discrepancies and come to concurrence. Once concurrence is reached on which PI/PAOCs will be investigated and the scope of the investigations, the Draft Final Work Plan will be submitted within 30 days.

Finally, the Navy recommends that the Work Plan be revised to be consistent with terminology and protocol conforming with CERCLA, due to the NPL listing of Vieques. As such, the Draft Final Work Plan will be submitted as a Draft Final PA/SI Work Plan.

Mr. Adolph Everett, P.E.  
Page 2  
May 27, 2005

Should you have any questions, please do not hesitate to contact Mr. Chris Penny at (757) 322-4815 or me at (757) 518-9666. Additionally, please direct any return correspondence to Mr. Chris Penny.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Brett Doerr". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

G. Brett Doerr  
CH2M HILL  
Environmental Manager

cc: Mr. Tim Gordon/USEPA (2 hardcopies, 2 CDs)  
Mr. Carl Soderberg/USEPA (1 hardcopy, 1 CD)  
Mr. Daniel Rodriguez/USEPA (1 hardcopy, 1 CD)  
Mr. Sergio Lopez/USEPA (1 hardcopy, 1 CD)  
Mr. Michael Sivak (copy of cover letter only)  
Mr. Andy Crossland/USEPA (1 hardcopy, 1 CD)  
Ms. Mindy Pensak/USEPA (1 hardcopy, 1 CD)  
Mr. Dale Carpenter/USEPA (copy of cover letter only)  
Mr. José W. López Freytes, Esq/PREQB (copy of cover letter only)  
Ms. Yarissa Martinez/PREQB (2 hardcopies, 2 CDs)  
Mr. Julio Rodriguez/PREQB (1 hardcopy, 1 CD)  
Mr. Bud Oliveira/USFWS (1 hardcopy, 1 CD)  
Sr. Oscar Diaz/USFWS (1 hardcopy, 1 CD)  
Ms. Susan Silander/USFWS (1 hardcopy, 1 CD)  
Sr. Felix Lopez Arroyo/USFWS (1 hardcopy, 1 CD)  
Mr. Byron Brant/Navy (1 hardcopy, 1 CD)  
Mr. Christopher Penny/Navy (1 hardcopy, 1 CD)  
Mr. Jeffrey Harlow/Navy (1 hardcopy, 1 CD)  
Ms. Madeline Rivera/Navy (1 hardcopy, 1 CD)  
Ms. Katarina Rutkowski/TRC (1 hardcopy, 1 CD)  
Mr. Andrew Smyth/TRC (1 hardcopy, 1 CD)  
Ms. Diane Wehner/Ridolfi (1 hardcopy, 1 CD)